

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AFT MICHIGAN,

Plaintiff,

v.

PROJECT VERITAS,
and MARISA L. JORGE,
a/k/a MARISSA JORGE, a/k/a
MARISSA PEREZ,

Civil Case No. 17-cv-13292
Honorable Linda V. Parker
Honorable Elizabeth A. Stafford

Defendants.

**PROJECT VERITAS PARTIES' RESPONSE TO
NON-PARTY RHONDA WEINGARTEN'S
MOTION FOR A PROTECTIVE ORDER**

INDEX OF EXHIBITS

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| Exhibit 1 | Excerpts of the deposition transcript of David Hecker, October 15, 2019 |
| Exhibit 2 | September 29, 2017 e-mail from Jessica Rutter, produced in this matter as AFTMI0000170 |
| Exhibit 3 | December 4, 2019 e-mail from Mark Cousens to Paul Mersino and Stephen Klein |
| Exhibit 4 | Excerpts of the American Federation of Teachers 2019 LM-2 Labor Organization Annual Report |
| Exhibit 5 | June 16, 2019 e-mail from Mark Cousens to Ann Sherman |
| Exhibit 6 | March 3, 2020 e-mail from Mark Cousens to Paul Mersino and Stephen Klein |

- Exhibit 7 Press releases from the American Federation of Teachers
- Exhibit 8 *Judge: Group can use info from union*, LANSING STATE J., Dec. 29, 2017 at A6
- Exhibit 9 March 6, 2020 e-mail from Abigail Carter to Stephen Klein
- Exhibit 10 Unreported Michigan Uniform Trade Secrets Act opinions:
- *Dice Corp. v. Bold Techs. Ltd.*, No. 11-CV-13578, 2014 WL 2763618 (E.D. Mich. June 18, 2014)
 - *Degussa Admixtures, Inc. v. Burnett*, 277 F. App'x 530 (6th Cir. 2008)
 - *Whitesell Intern. Corp. v. Whitaker*, 2010 WL 3564841 (Mich. Ct. App. 2010)
 - *Whitesell Int'l Corp v. Whitaker*, 2011 WL 165405 (Mich. Ct. App. 2011)
 - *Bearing360 LLC v. Cameron*, 2017 WL 3798491 (Mich. Ct. App. 2017)
- Exhibit 11 Unreported Eastern District of Michigan rulings regarding video recording of depositions:
- *Flagg v. City of Detroit*, 2010 WL 3070104 (E.D. Mich. 2010)